

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,
v.
NURIS RAMÍREZ-HERNÁNDEZ,
Defendant.

CRIMINAL No. 25-092 (GMM)

SENTENCING MEMORANDUM

TO THE HONORABLE COURT

Nuris Ramirez stands before this Court deeply remorseful for having re-entered the United States without authorization after previously being removed. She does not deny responsibility for her actions and fully accepts the consequences. However, this Court is empowered under § 3553(a) to consider the totality of her circumstances, particularly her lifelong record of selfless sacrifice, her role as the sole caregiver for multiple dependents, and the unique personal tragedy she has suffered surrounding her arrest.

A. Devoted Mother and Family Caregiver

Nuris Ramirez is a mother of four children and has been their sole provider for most of their lives. Her dedication to her children is unwavering. In addition to caring for her own children, she has served as the primary provider for her elderly mother and grandmother, all of whom depend on her emotionally and financially. Her role within the family is irreplaceable.

B. Personal Tragedy and Separation from Her Children

Just one week prior to her arrest, Nuris Ramirez's husband lost his battle with cancer. In the devastating aftermath of his passing and her subsequent detention, her youngest child—only 8-years old—was placed into foster care in New York. She is now engaged in a legal effort to have her son reunited with her in the Dominican Republic, where she plans to rebuild their lives. The

separation has caused her immense anguish and threatens the well-being of her child.

C. History of Hard Work and Responsibility

From the age of 12, Nuris has worked tirelessly to support her family. Despite extreme poverty during her childhood—when she often went to bed hungry—she found the strength to provide a better life for her children. Her decision to return to the United States was not motivated by greed or disregard for the law, but by the deeply human desire to ensure her children would not suffer the same deprivation she endured.

D. No Prior Criminal History and Positive Character

Nuris Ramirez has no prior criminal history of any kind. She is a law-abiding individual who respects the rules of society. She is a devout Christian and active in her church, known in her community for her generosity, humility, and resilience. She has always sought to live a life centered around faith, family, and hard work.

Nuris' statutory exposure as per the Indictment is as follows:

Imprisonment:	0-2 years (8 U.S.C. §1326(a))
SRT:	up to 1 year (18 U.S.C. §3583(b)(3))
Probation:	1-5 years (18 U.S.C. §3561(c)(1))
Fine:	max of \$250,000 (18 U.S.C. § 3571(b)(3))
SMA:	\$100 (18 U.S.C. §3013(a)(2)(A))

Under 18 U.S.C. § 3553(a), the Court is directed to impose a sentence “sufficient, but not greater than necessary” to reflect the seriousness of the offense, promote respect for the law, and provide just punishment. In this case, a sentence of time served is justified given:

- The non-violent nature of the offense.
- Her clean criminal record.
- Her extraordinary family obligations.
- The traumatic circumstances surrounding her arrest.
- Her sincere remorse and acceptance of responsibility.

- The disproportionate impact incarceration would have on her minor children.

Continued incarceration serves no rehabilitative function and would further harm vulnerable children already facing the trauma of losing both parents in rapid succession.

CONCLUSION

This Court is faced with the sentencing of a woman whose actions, while unlawful, stemmed from a place of desperation and love for her family. She is not a danger to society, nor does she pose a threat of recidivism. Her life has been a testament to perseverance in the face of adversity. Accordingly, Nuris Ramirez-Hernandez respectfully requests that the Court impose a sentence of time served or a sentence that permits her prompt return to her family in the Dominican Republic.

WHEREFORE, it is respectfully requested that this Honorable Court take notice of the above and sentence Ms. Ramirez to the time she has already served.

I HEREBY CERTIFY that on this date I electronically filed the present motion with the Clerk of Court using the CM/ECF system that will send electronic notification of said filing to all parties of record.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 9th day of May 2025.

RACHEL BRILL
Federal Public Defender
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